

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	CASE NO: 2:19-cr-53
	:	
v.	:	CHIEF JUDGE EDMUND A. SARGUS, JR.
	:	
ANDREW K. MITCHELL,	:	
	:	
Defendant.	:	

MOTION OF DEFENDANT
TO CONTINUE ALL TRIAL DEADLINES

Now comes Defendant, Andrew K. Mitchell, by and through counsel, Mark C. Collins, who hereby requests a continuance of all deadlines and Court dates. Defendant also continues to waive time for said request. The reasons for said request are more fully stated in the attached Memorandum in Support.

Respectfully submitted,

/s/ Mark C. Collins
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MEMORANDUM IN SUPPORT

As the Court is aware, Defense Counsel also represents Mr. Mitchell in *State of Ohio v. Andrew Mitchell*, case; 19 CR 1662, a murder charge, set in front of the Honorable Judge Young, in the Common Pleas Court of Franklin County, as well as the above styled case. In the state case, all parties are working with each side's experts' schedules to select a definite trial date. It is Defense Counsel's intention to select a definite state trial date during the status conference set before the Honorable Judge Young on February 24, 2020. It is Defense Counsel's belief that it is in Mr. Mitchell's best interest to focus on one matter at a time; that being the murder charge in the state case. The Assistant United States Attorney, Kevin Kelley, is in agreement with the state's case proceeding prior to the federal case, and supports this motion. Defendant by and through Counsel hereby again waives speedy trial rights in the above style case.

Respectfully submitted,

/s/ Mark C. Collins

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Attorneys for Defendant Andrew K. Mitchell

CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2020, I electronically filed the Motion to Continue with Chief Judge Edmund A. Sargus, Jr., using the CM/ECF System, which will send notification of such filing to the following: and Kevin W. Kelley, Esq.

/s/ Mark C. Collins

MARK C. COLLINS (0061207)